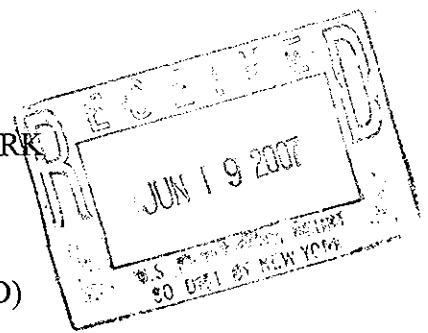


UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK



In Re: :  
DELPHI CORPORATION, et al., : Chapter 11  
: Case No.: 05-44481 (RDD)  
: (Jointly Administered)  
Debtors. :

RESPONSE OF AMES REESE, INC. TO DEBTORS'  
OMNIBUS OBJECTION TO VARIOUS PROOFS OF CLAIM

1. Ames Reese, Claimant, filed Proofs of Claim on July 18, 2006.
2. Claimant as creditor of Delphi Automobile Systems, LLC filed three Proofs of Claim totaling \$4,800.00, \$118,242.99 and \$13,417.47 respectively.
3. Delphi has objected to claim no. 9816 (\$13,417.47) and claim no. 9820 (\$118,242.99). Delphi proposes to modify claim no. 9816 to \$8,117.47 and claim no. 9820 to \$97,736.39. Both claims are general unsecured claims.
4. Upon further inquiry, Delphi counsel indicated that \$9,000.00 of the disputed amount deals with lack of proof of delivery on three invoices 11907, 11964 and 11895. Delphi was asked to provide inventory sheets (which Delphi has failed to do so at this point) verifying product delivery. Invoice no. 11907 dealt with various surcharges passed to Delphi for unexpected price increases of powder metal suppliers pursuant to the purchase order in effect so there would be no proof of delivery on that claim.
5. Delphi has contended that \$7,200.00 of the claims were objected to because they allegedly involved post-petition amounts; however, no documentation was provided by Delphi as to which particular invoices are at issue or what was paid post-petition. After diligent search, Claimant is unable to verify the objected amount as being paid post-petition.

6. Delphi also indicated the following to Claimant:

(a) Invoice no. 11996 was a duplicate of some other invoice. Again, Delphi provided no verification as to what other invoice was duplicated or what amount was involved. \$289.00 of the total claim was due to a math error. Again, no documentation was provided. \$783.00 was objected to on the basis of a pre-petition debit memo (memo #709987) sent from Delphi to Claimant. Claimant has no documentation concerning any pre-petition debit memo for \$783.00 that was objected to.

(b) Approximately 60 invoices making up claim no. 9820 are in dispute because of "general billing" issues totaling \$3,291.90. Again, Delphi has failed to produce any documentation concerning these allegations.

7. Proofs of claim filed in this matter for the above-referenced claims in dispute have all invoiced documentation as well as relevant prices, delivery information, description of order and place of delivery.

8. No amount of the claim is unliquidated.

9. Debtors should return any reply to the response to Claimant's general counsel, Matthew C. Samley, Esquire, Reese, Pugh, Samley, Wagenseller & Mecum, 120 North Shippen Street, Lancaster, PA 17602 (717)393-0671, mcs@trustmattersmost.com.

WHEREFORE, Debtors' objection to Ames Reese, Inc.'s Proof of Claim no. 9816 and 9820 and proposed modified treatment in the Plan should be overruled.



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Henry Trabal, General Manager - Ames Reese

**CERTIFICATE OF SERVICE**

I hereby certify that I have served a true and correct copy of the foregoing Response of Ames Reese, Inc. to Debtors' Omnibus Objection to Various Proofs of Claim upon the persons and in the manner indicated below, which service satisfies the requirements of the Local Bankruptcy Rules for the Southern District of New York.

Service by First Class Mail addressed as follows:

The Honorable Robert D. Drain  
U.S. Bankruptcy Judge  
U.S. Bankruptcy Court for the Southern District of New York  
One Bowling Green  
Room 610  
New York, NY 10004

Delphi Corporation  
Attn.: General Counsel  
5725 Delphi Drive  
Troy, MI 48098

Skadden, Arps, Slate, Meagher & Flom, LLP  
Attn.: John Wm. Butler, Jr., Esquire  
John K. Lyons, Esquire  
Joseph N. Wharton, Esquire  
333 West Wacker Drive  
Suite 2100  
Chicago, IL 60606



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Henry Trabal, General Manager –Ames Reese